

1 PAUL J. PASCUZZI, State Bar No. 148810
JASON E. RIOS, State Bar No. 190086
2 THOMAS R. PHINNEY, State Bar No. 159435
FELDERSTEIN FITZGERALD WILLOUGHBY

3 PASCUZZI & RIOS LLP
500 Capitol Mall, Suite 2250
4 Sacramento, CA 95814
Telephone: (916) 329-7400
5 Facsimile: (916) 329-7435
Email: ppascuzzi@ffwplaw.com
6 jrios@ffwplaw.com
tphinney@ffwplaw.com

7 ORI KATZ, State Bar No. 209561
8 ALAN H. MARTIN, State Bar No. 132301
SHEPPARD, MULLIN, RICHTER & HAMPTON LLP
9 A Limited Liability Partnership
Including Professional Corporations
10 Four Embarcadero Center, 17th Floor
San Francisco, California 94111-4109
11 Telephone: (415) 434-9100
Facsimile: (415) 434-3947
12 Email: okatz@sheppardmullin.com
amartin@sheppardmullin.com

13 Proposed Attorneys for The Roman Catholic
14 Archbishop of San Francisco

15 UNITED STATES BANKRUPTCY COURT

16 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

17
18 In re
19 THE ROMAN CATHOLIC ARCHBISHOP
OF SAN FRANCISCO,

20 Debtor and
21 Debtor in Possession.

Case No. 23-30564

Chapter 11

**DECLARATION OF JOSEPH J.
PASSARELLO IN SUPPORT OF
APPLICATION TO EXTEND TIME TO
FILE SCHEDULES AND STATEMENT OF
FINANCIAL AFFAIRS**

[No Hearing Required]

24 I, Joseph J. Passarello, hereby declare as follows:

25 1. I am the Chief Financial Officer (“CFO”) of The Roman Catholic Archbishop of San
26 Francisco, the debtor and debtor in possession herein (“RCASF” or the “Debtor”). I have been the
27 CFO of the RCASF since January 2014. Before that, I have been the CFO for several other
28 companies including Serena Software, Aptina Imaging, AMI Semiconductor, and Therma-Wave,

1 Inc. I have a Master of Business Administration from Santa Clara University and a Bachelor of
2 Science in Economics and Business Administration from St. Mary's College. I am authorized to
3 provide this declaration (the "Declaration") setting forth the general structure and history of the
4 RCASF. In the course and scope of my duties as CFO, I am familiar with the record keeping
5 practices and policies of the RCASF and how it regularly maintains its business records.

6 2. All facts set forth in this Declaration are based on my personal knowledge, upon
7 information supplied to me by people who report to me, upon information supplied to me by the
8 RCASF's professionals and consultants, upon my review of relevant documents, or upon my opinion
9 based on my experience and knowledge regarding the RCASF's operations, financial condition, and
10 related business issues. The documents submitted herewith, referenced herein or otherwise relied
11 upon by me for purposes of this Declaration are the business records of the RCASF, prepared and
12 maintained in the ordinary and regularly conducted business activity of the RCASF, and used by me
13 for those purposes. If I were called upon as a witness, I could and would testify competently to the
14 facts set forth herein, and I am authorized to submit this Declaration on behalf of the RCASF.

15 3. I submit this Declaration in support of the Debtor's Application to Extend Time to
16 File its Schedules and Statement of Financial Affairs ("Application").

17 4. On August 21, 2023, the RCASF initiated this case by filing a voluntary Chapter 11
18 Petition ("Petition Date").

19 5. The Debtor and its advisors have been diligently preparing the Schedules and
20 Statement of Financial Affairs (collectively, "Schedules") and continue to gather the information
21 needed for the required filings. The need to prepare the Schedules accurately and in adherence to
22 confidentiality requirements requires significant time and attention from the Debtor's professionals
23 and advisors.

24 6. Additionally, the Debtor respectfully submits that the size and complexity of its
25 operations, the limited staff available to perform the required internal review of financial records
26 and affairs, the numerous critical operations matters that the Debtor's personnel must address in the
27 early days of this chapter 11 case, and the pressure incident to the commencement of this chapter
28 11 case provide cause justifying the requested extension of the deadline to file the Schedules.

1 Although the Debtor and its professionals have been working diligently on completing the
2 Schedules, it will be extremely challenging to complete this undertaking without an extension.

3 7. Due to the amount of information that needs to be gathered from multiple sources to
4 prepare the Schedules and the various demands on the Debtor's employees, the Debtor needs and
5 requests an additional 16 days to prepare the Schedules.

6 I declare under penalty of perjury that the foregoing is true and correct. Executed on August
7 28, 2023, at San Francisco, California.

8
9 /s/ Joseph J. Passarello
10 Joseph J. Passarello
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28